

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

AMERICAN CIVIL LIBERTIES UNION, and
AMERICAN CIVIL LIBERTIES UNION OF
MASSACHUSETTS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
JUSTICE, FEDERAL BUREAU OF
INVESTIGATION, and DRUG
ENFORCEMENT ADMINISTRATION

Defendants.

C.A. No. 1:19-CV-12242-WGY

JOINT MOTION TO EXTEND TIME
FOR FILING MOTION FOR SUMMARY JUDGMENT

Defendants, U.S. Department of Justice, Federal Bureau of Investigation and Drug Enforcement Administration (collectively “Defendants”), by their attorney, Nathaniel R. Mendell, Acting U.S. Attorney for the District of Massachusetts, together with the Plaintiffs, American Civil Liberties Union and American Civil Liberties Union of Massachusetts (collectively “Plaintiffs”) respectfully request the Court to extend the date by which Defendants are to file their Motion for Summary Judgment to August 31, 2021.

As grounds for this motion, Defendants state that they have had several discussions with Plaintiffs regarding the schedule in this matter. Defendants provided Plaintiffs with its Vaughn index on March 3, 2021 and a supplemental Vaughn index on March 31, 2021. Since then, Defendants responded to several inquiries regarding the scope of its production and conducted a supplemental search on Plaintiffs’ request. As a result of this supplemental search, Defendant expect to make a final production of documents on July 29, 2021. Following this, the parties will

consult in an attempt to narrow and resolve remaining issues. Defendants will file their Motion for Summary Judgment on any remaining issues on or before August 31, 2021.

Plaintiffs agree to the revised schedule set forth herein but are not inclined to agree to further extensions and respectfully suggest that further extensions should not be granted.

WHEREFORE, the parties request that the Court grant their motion and order that the Defendants shall file their Motion for Summary Judgment on or before August 31, 2021.

Respectfully submitted,

NATHANIEL R. MENDELL
Acting U.S. Attorney

By: /s/ Susan M. Poswistilo
SUSAN M. POSWISTILO
Assistant U.S. Attorney
John J. Moakley Federal Courthouse
One Courthouse Way, Ste. 9200
Boston, MA 02210
(617) 748-3103
susan.poswistilo@usdoj.gov

FOR THE PLAINTIFFS

/s/ David Glod
David Glod (BBO #676859)
RICH MAY, P.C.
176 Federal Street, 6th Floor
Boston, MA 02110
(617) 556-3852
dglod@richmaylaw.com